

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Robert James Bell

Case No. Case: 2:23-mj-30393
Assigned To : Unassigned
Assign. Date : 9/27/2023
USA V. SEALED MATTER (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 15, 2023 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1708	Mail Theft
18 U.S.C. § 1704	Possession of an Arrow Key

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 27, 2023

City and state: Detroit, Michigan



Complainant's signature

Inspector Darryl Sage, U.S. Postal Inspection Service

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Darryl Sage, being duly sworn, hereby depose and state as follows:

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS) assigned to the Financial Crimes Team – Detroit Division Headquarters in Detroit, Michigan. I have been so employed since January 2022. The USPIS is the federal agency charged with investigating violations of criminal and civil statutes related to the United States Postal Service (USPS). I have received training in investigating violations of federal law related to mail theft, mail fraud, credit card fraud, and the distribution of controlled substances through the mail. Prior to becoming a U.S. Postal Inspector, I was a federal law enforcement officer with U.S. Customs and Border Protection since 2015 and was empowered to exercise the authority and perform the duties provided by law and the Department of Homeland Security regulations, including making arrests; conducting searches; making seizures; bearing firearms; and serving any order, warrant, or other process. This included but was not limited to enforcing violations of Title 18 United States Code, Title 19 United States Code, and Title 8 United States Code. During my employment with USPIS, I have been trained in various criminal investigative techniques involving mail theft, mail fraud, and the distribution of controlled substances. During my career as a Postal Inspector, I have been

trained in the execution of various search warrants involving searches and seizures of residences and vehicles. These warrants often include but are not limited to seizures of computers, phones, various electronic devices, narcotics, mail, and weapons.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of a criminal complaint alleging violations of 18 U.S.C. § 1708 (Mail Theft) and 18 U.S.C. § 1704 (Possession of Arrow Key), further known as **TARGET OFFENSES**, which are believed to have been committed by ROBERT BELL, further known as **TARGET SUBJECT**. It does not set forth all the facts known to me in this investigation.

PROBABLE CAUSE

4. Since approximately June 2023, the West Bloomfield Police Department (WBPD) and USPIS have been conducting an ongoing investigation into the

mail thefts occurring from the USPS collection boxes located adjacent to the West Bloomfield Post Office, 6725 Daly Rd., West Bloomfield, MI 48322.

5. On September 15, 2023, at approximately 0000 hours, SONIC, a law enforcement surveillance unit, established physical surveillance at the West Bloomfield Post Office. At approximately 0020 hours, SONIC Detective (Det.) Sgt. Wessel observed a grey Pontiac G8 with no license plate and a missing passenger taillight pull into the post office parking lot. The Pontiac pulled up to the collection boxes.
6. Sgt. Wessel observed an unknown black male subject, later identified as the **TARGET SUBJECT**, exit the driver's door. The **TARGET SUBJECT** was wearing a black hoodie with the hood up and black shorts. The **TARGET SUBJECT** opened the collection box, removed the mail collection tub from inside the collection box, and dumped the mail into the Pontiac. The **TARGET SUBJECT** then pulled to the second set of collection boxes and opened the collection box, removed the mail collection tub from inside the collection box, and dumped the mail into the Pontiac. The **TARGET SUBJECT** then entered the Pontiac and left the parking lot eastbound on Powers Rd.
7. SONIC detectives maintained physical surveillance of the **TARGET SUBJECT**, following him southbound on Orchard Lake Rd. and then south

on Northwestern Hwy. SONIC detectives followed the **TARGET SUBJECT** to Romulus, Michigan.

8. At approximately 0104 hours, Det. Geffert observed the **TARGET SUBJECT** drive the Pontiac to the post office at 11000 Hunt St., Romulus, MI 48174, and park next to the collection boxes. Det. Geffert observed the same **TARGET SUBJECT** from West Bloomfield exit the Pontiac and approach the collection box. The **TARGET SUBJECT** opened the collection box, removed the mail collection tub, and dumped the mail into the Pontiac. The **TARGET SUBJECT** entered the Pontiac and left the parking lot. SONIC Detectives maintained physical surveillance of the **TARGET SUBJECT**.
9. SONIC detectives followed the **TARGET SUBJECT** into the area of I-96 and Outer Dr. Sgt. Wessel requested the Michigan State Police (MSP) to conduct a stop on the **TARGET SUBJECT** and vehicle. The Pontiac drove northbound on Outer Dr. and turned eastbound onto Kendall St. near Greendale St. MSP Troopers arrived in the area and initiated a traffic stop on the **TARGET SUBJECT** in the Pontiac. MSP Trooper Anderson, badge number 215, took the **TARGET SUBJECT** out of the vehicle into custody. The **TARGET SUBJECT** was the only occupant of the vehicle. At the time of the stop, SONIC Det. Yummy observed a large amount of mail scattered

throughout the vehicle. Det. Voiles observed what appeared to be multiple USPS Arrow Keys inside of the cup holder in the center console.

10. The **TARGET SUBJECT** was identified as Robert James Bell, born February 15, 2001. The **TARGET SUBJECT** was taken into custody and turned over to WBPD Ofc. Even. Ofc. Even transported the **TARGET SUBJECT** to the WBPD where the **TARGET SUBJECT** was booked, fingerprinted, and lodged (Reference MSP Report Number 23-7847).
11. The **TARGET SUBJECT** requested that Det. Yummy retrieve his white Apple iPhone from the Pontiac. The iPhone was transported to WBPD and logged into WBPD property.
12. SONIC Detectives secured the Pontiac G8, which was impounded by Lakeside Towing. The **TARGET SUBJECT** was identified as the registered owner of the Pontiac. Det. Voiles and Det. Geffert maintained chain of custody by following Lakeside Towing to the WBPD. The Pontiac was secured in the WPBD garage bay two pending further investigation.
13. Det. Beasley obtained a state of Michigan search warrant from the 48th District Court to search the Pontiac G8 for further evidence of mail theft and related offenses. Upon a search of the vehicle, investigators found approximately 50 pieces of mail and three USPS Arrow Keys in the cup holder in the center console.

CONCLUSION

14. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that violations of Title 18 U.S.C. § 1708 (Mail Theft) and 18 U.S.C. § 1704 (Possession of Arrow Key) have been committed by the **TARGET SUBJECT**.

Respectfully Submitted,



Darryl R. Sage, Postal Inspector
United States Postal Inspection Service

Sworn to before me in my presence and/or
by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: September 27, 2023